

From: Schechter, Kathryn [Schechter.Kathryn@epa.gov]
Sent: 1/28/2022 3:51:44 PM
To: Griffin, Stephanie [griffin.stephanie@epa.gov]
CC: Butler, Tristan [Butler.Tristan@epa.gov]
Subject: RE: 8a7 scope: specific substances of interest

Ex. 5 Deliberative Process (DP)

From: Griffin, Stephanie <griffin.stephanie@epa.gov>
Sent: Friday, January 28, 2022 10:43 AM
To: Schechter, Kathryn <Schechter.Kathryn@epa.gov>
Cc: Butler, Tristan <Butler.Tristan@epa.gov>
Subject: RE: 8a7 scope: specific substances of interest

Ex. 5 Deliberative Process (DP)

From: Schechter, Kathryn <Schechter.Kathryn@epa.gov>
Sent: Friday, January 28, 2022 10:28 AM
To: Griffin, Stephanie <griffin.stephanie@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>
Subject: RE: 8a7 scope: specific substances of interest

Ex. 5 Deliberative Process (DP)

From: Griffin, Stephanie <griffin.stephanie@epa.gov>
Sent: Friday, January 28, 2022 10:04 AM
To: Schechter, Kathryn <Schechter.Kathryn@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>
Subject: RE: 8a7 scope: specific substances of interest

Thanks... So I have two takeaways on this:

Ex. 5 Deliberative Process (DP)

Thanks again!

From: Schechter, Kathryn <Schechter.Kathryn@epa.gov>
Sent: Friday, January 28, 2022 9:56 AM
To: Butler, Tristan <Butler.Tristan@epa.gov>; Griffin, Stephanie <griffin.stephanie@epa.gov>
Subject: RE: 8a7 scope: specific substances of interest

Ex. 5 Deliberative Process (DP)

From: Schechter, Kathryn
Sent: Friday, January 28, 2022 9:53 AM
To: Butler, Tristan <Butler.Tristan@epa.gov>; Griffin, Stephanie <griffin.stephanie@epa.gov>
Subject: RE: 8a7 scope: specific substances of interest

Ex. 5 Deliberative Process (DP)

Kathy

From: Butler, Tristan <Butler.Tristan@epa.gov>
Sent: Friday, January 28, 2022 9:21 AM
To: Griffin, Stephanie <griffin.stephanie@epa.gov>; Schechter, Kathryn <Schechter.Kathryn@epa.gov>
Subject: RE: 8a7 scope: specific substances of interest

Hi Stephanie,

I have nothing additional to add Ex. 5 Deliberative Process (DP) and I agree with your takeaway. Thanks!

Tristan

From: Griffin, Stephanie <griffin.stephanie@epa.gov>
Sent: Friday, January 28, 2022 9:11 AM
To: Schechter, Kathryn <Schechter.Kathryn@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>
Subject: RE: 8a7 scope: specific substances of interest

Hi Kathy and Tristan,

Ex. 5 Deliberative Process (DP)

Thanks!
Steph

From: Griffin, Stephanie
Sent: Wednesday, January 26, 2022 4:52 PM
To: Bushman, Daniel <Bushman.Daniel@epa.gov>; Schechter, Kathryn <Schechter.Kathryn@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>
Cc: Turk, David <Turk.David@epa.gov>
Subject: RE: 8a7 scope: specific substances of interest

Thanks everyone for your input—I appreciate the helpful feedback. Below I added Kathy and Tristan’s earlier input to

Ex. 5 Deliberative Process (DP)

Please let me know if anything above is incorrect. I want to ensure I’m addressing OGC concerns and we can provide a reasonable line in the sand for the potential continuation of the proposed definition.

Thanks,
Steph

From: Bushman, Daniel <Bushman.Daniel@epa.gov>

Sent: Wednesday, January 26, 2022 4:23 PM

To: Schechter, Kathryn <Schechter.Kathryn@epa.gov>; Griffin, Stephanie <griffin.stephanie@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>

Cc: Turk, David <Turk.David@epa.gov>

Subject: RE: 8a7 scope: specific substances of interest

Ex. 5 Deliberative Process (DP)

Daniel R. Bushman, Ph.D.
Petitions Coordinator and Chemical List Manager
Toxics Release Inventory Program
202-566-0743
www.epa.gov/tri/chemicals

From: Schechter, Kathryn <Schechter.Kathryn@epa.gov>

Sent: Wednesday, January 26, 2022 4:15 PM

To: Bushman, Daniel <Bushman.Daniel@epa.gov>; Griffin, Stephanie <griffin.stephanie@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>

Cc: Turk, David <Turk.David@epa.gov>

Subject: RE: 8a7 scope: specific substances of interest

Ex. 5 Deliberative Process (DP)

From: Bushman, Daniel <Bushman.Daniel@epa.gov>

Sent: Wednesday, January 26, 2022 4:05 PM

To: Griffin, Stephanie <griffin.stephanie@epa.gov>; Schechter, Kathryn <Schechter.Kathryn@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>

Cc: Turk, David <Turk.David@epa.gov>

Subject: RE: 8a7 scope: specific substances of interest

Ex. 5 Deliberative Process (DP)

Daniel R. Bushman, Ph.D.
Petitions Coordinator and Chemical List Manager
Toxics Release Inventory Program
202-566-0743
www.epa.gov/tri/chemicals

From: Butler, Tristan Butler.Tristan@epa.gov
Sent: Wednesday, January 26, 2022 4:08 PM
To: Schechter, Kathryn Schechter.Kathryn@epa.gov; Griffin, Stephanie griffin.stephanie@epa.gov; Bushman, Daniel Bushman.Daniel@epa.gov
Cc: Turk, David Turk.David@epa.gov
Subject: RE: 8a7 scope: specific substances of interest
Hi All,

I don't have much to add beyond what Kathy already sent, but H=here are my thoughts regarding the specific substances mentioned in Stephanie's email:

Ex. 5 Deliberative Process (DP)

PFMOAA- Does not meet the OPPT working definition of PFAS and does not contain an obvious synthetic byproduct that is PFAS. I do not see a way to adjust the OPPT working definition to include this substance. Most likely degrades into TFA

Fluorinated gases- It is difficult to say which of these substances would or would not meet the OPPT working definition, but it is safe to say that some of these substance would be excluded from reporting if current definition is used to define the scope.

From: Schechter, Kathryn <Schechter.Kathryn@epa.gov>

Sent: Wednesday, January 26, 2022 3:57 PM

To: Griffin, Stephanie <griffin.stephanie@epa.gov>; Bushman, Daniel <Bushman.Daniel@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>

Cc: Turk, David <Turk.David@epa.gov>

Subject: RE: 8a7 scope: specific substances of interest

Ex. 5 Deliberative Process (DP)

From: Griffin, Stephanie <griffin.stephanie@epa.gov>

Sent: Wednesday, January 26, 2022 3:31 PM

To: Bushman, Daniel <Bushman.Daniel@epa.gov>; Schechter, Kathryn <Schechter.Kathryn@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>

Cc: Turk, David <Turk.David@epa.gov>

Subject: 8a7 scope: specific substances of interest

Hi Kathy, Tristan, and Dan,

Here is the Teams file of comment excerpts & their summary describing specific substances that they believe are out of scope of the NPRM's definition, and would like to have included in the final rule. Some of the more commonly cited substances:

- various fluoropolymers, including PVDF, Fluoroethylene vinyl ether (FEVE), Ethylene-chlorotrifluoroethylene copolymer (ECTFE), and Polychlorotrifluoroethylene (PCTFE)
- trifluoroacetic acid (TFA) and other short-chain perfluorinated carboxylic acids
- fluorinated gases with only one -CF₃ group, including HFCs, HFOs, and HCFOs

Ex. 5 Deliberative Process (DP)

Note- I haven't yet thoroughly reviewed and edited the summary. If you see problems within the summary, please feel free to flag those for me!

Stephanie Griffin
Data Collection Branch
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
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